VOLUME 6 SURVEILLANCE

CHAPTER 9 PART 145 INSPECTIONS

Section 23 Safety Assurance System: Inspect a Part 145 Repair Station's Contract Maintenance Program

6-2103 REPORTING SYSTEM(S). Use Safety Assurance System (SAS) automation. This section is related to SAS Element(s) 4.5.5 (RS 20), Contract Work—Certificated, and 4.5.6 (RS 20), Contract Work—Noncertificated, for domestic and foreign repair station peer groups.

6-2104 OBJECTIVE. This section provides guidance for inspecting a Title 14 of the Code of Federal Regulations (14 CFR) part 145 repair station's contract maintenance program.

6-2105 GENERAL.

A. Type of Inspection.

- 1) Reasons for Inspection. Aviation safety inspectors (ASI) should conduct this inspection because of:
 - SAS Comprehensive Assessment Plan (CAP),
 - A previous surveillance effort,
 - Allegations of improper maintenance, or
 - Component failure trends.
- **2) Inspection Frequency.** The inspection frequency may be based on one or more of these risk indicators, may result in a comprehensive inspection, or may be focused on a specific identified risk.
- **B. Policy Review.** The principal inspector (PI) or ASI should carefully review the regulations and applicable Federal Aviation Administration (FAA) policy prior to the visit. The FAA advises that the inspector place special emphasis on the facility maintenance and on inspection personnel training records. The inspector must accomplish a verification of training. Contractors must receive training and have the qualifications to perform the contracting repair station's tasks.
- **C. Part 145 Requirements.** When providing services to a contracting repair station, the contract maintenance provider must meet all requirements of part 145, § 145.217.

NOTE: The regulations enable a repair station to contract any maintenance, preventive maintenance, or alteration for which it holds a rating, per § 145.201(a)(2). For the purpose of this section, contracting is defined as work performed by FAA certificated or noncertificated persons when the originating repair station assumes responsibility for the work performed by issuing an approval for return to service. A contract maintenance provider for a maintenance function must not provide a complete repair of a type-certificated (TC) product.

The FAA must approve all contract maintenance functions, whether to a certificated or noncertificated provider.

- **D.** Maintenance Procedures. All repair stations contracting maintenance must have procedures in their Repair Station Manual (RSM) explaining how to accomplish this maintenance. Procedures should exist for both sending the product out to the contract maintenance provider and receiving the product back into the repair station. The PI should make sure each procedure includes sufficient details to explain the sending and/or receiving process. Procedures should exist to carry out specific repair instructions and should detail the steps contractors should follow to ensure they accomplish the instructions. Procedures should exist to detail how the receiving repair station should inspect work and to assure that the contractors accomplish the work per repair station work scope, manufacturer's specifications, and, if applicable, FAA-approved data.
- **E.** Contract Maintenance Functions. The PI/ASI must verify that the repair station has given a copy of all contract maintenance functions, and a list of the contractor maintenance providers, to the certificate-holding district office (CHDO). Only the functions list must be approved.
- **F.** Air Carrier Maintenance Instructions. Each repair station sending maintenance to a contract maintenance provider must assure that, if the product is from an air carrier, the provider receives and follows all air carrier maintenance instructions for that product.

6-2106 PREREQUISITES AND COORDINATION REQUIREMENTS.

A. Prerequisites:

- Knowledge of the regulatory requirements of part 145.
- Knowledge of the RSM.
- Previous experience with part 145 operations.
- **B.** Coordination. This task may require coordination with other specialties or district offices and the certificate holder. If the repair station has an assigned principal maintenance inspector (PMI) and a principal avionics inspector (PAI), the two inspectors should coordinate the inspection between them.

6-2107 REFERENCES, FORMS, AND JOB AIDS.

A. References (current editions):

- Title 14 CFR Parts 43, 65, 121, 125, 135, and 145.
- Volume 2, Chapter 11, Section 1, Introduction.
- Advisory Circular (AC) 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals.
- B. Forms. None.
- C. Job Aids. None.

6-2108 PROCEDURES.

A. Review Applicable Information. Before inspecting, the PI should carefully review the following:

- 1) Parts 43 and 145.
- 2) Operations specifications (OpSpecs).
- 3) The Safety Performance Analysis System (SPAS).

NOTE: For additional information on SPAS data, refer to Volume 6, Chapter 9, Section 1, paragraph 6-1630.

- 4) Enhanced Vital Information Database (eVID).
- 5) CHDO files.
- **B.** Conduct an In-Briefing. Brief the certificate holder on the purpose of the inspection. This in-brief may take place at the beginning of the inspection or at the beginning of each day. You can find detailed instructions for conducting this briefing in Volume 6, Chapter 9, Section 5.
- **C. Review the RSM/Quality Control Manual (QCM).** Verify the RSM/QCM procedures for maintaining and revising the contract maintenance function information required by § 145.217. The information required includes the approved maintenance functions the repair station will contract and the name of each certificated and noncertificated contract facility. The list of contractors is not FAA approved but must be in a format acceptable to the FAA.

NOTE: The FAA approves all maintenance functions contracted to both certificated and noncertificated facilities within the scope of the repair station's ratings.

- **D.** Review the Maintenance Function Facilities List. Review a representative sample of the maintenance records to verify the repair station is contracting only to facilities identified on the repair station's contract maintenance list.
- **E.** Check Records for Certificated Facility. If the repair station contracts a maintenance function to a certificated facility, verify if:
 - 1) All maintenance functions sent to certificated contractors are on the approved list.
- 2) There is a list of each outside facility—with function identified—to whom the repair station contracts maintenance. The list must include the name of the facility and the type of certificate and ratings.
- 3) All certificated facility items are returned to the repair station through the receiving inspection per the procedures in the quality system manual.

F. Review Records for a Noncertificated Facility. If the repair station contracts a maintenance function to a noncertificated facility, verify if:

- 1) All maintenance functions sent to noncertificated contractors are on the approved list.
- 2) The repair station ensures that all noncertificated persons performing contract maintenance functions follow a quality control (QC) system equivalent to that followed by the repair station.
- 3) The repair station verifies, through testing and/or inspection, that all work performed by noncertificated persons is satisfactory and Airworthy per the RSM/QCM.
- 4) The repair station approves articles for return to service that have been maintained by noncertificated contract maintenance providers per the RSM/QCM.
- 5) The certificated repair station remains directly in charge of the noncertificated facility work.
 - 6) The repair station is qualifying the noncertificated facility per the RSM/QCM.
- 7) The repair station has provisions for the FAA to inspect and observe the noncertificated facility's work on an article.
 - 8) Inspectors have appropriate technical data to determine airworthiness.
 - 9) Inspectors are properly trained and qualified to determine airworthiness.

NOTE: A repair station cannot maintain any article for which it is not rated, per the repair station rule.

- **G. Review the Repair Station's QC System.** For certificated and noncertificated contractors, the PI should consider:
- 1) The procedures the repair station uses to obtain approval for the maintenance function.
 - 2) The repair station's procedures to qualify the contractor.
- 3) The repair station's procedures for accomplishing contract surveillance if it is a noncertificated repair station.
 - 4) Procedures to properly maintain the contractor list.
- 5) Technical training on contracted functions for the repair station's receiving inspection personnel.
- **6)** Whether the repair station's procedures for receiving inspections provide enough technical detail to determine the airworthiness of an article.

7) The currency of the list of maintenance functions for which the repair station has the housing, facilities, equipment, and materials in house but may need to contract to another facility because of workload or emergency situations.

- **8)** If the method by which a maintenance function is added to the FAA-approved list on an emergency basis is per the repair station's RSM/QCM.
 - 9) If repair station personnel who inspect contract maintenance sources are trained.
 - **10**) If maintenance is performed per part 43, §§ 43.13, 43.15, and 43.16.

NOTE: The repair station cannot give a copy of its QCM to the noncertificated contractor and assume the contractor will follow proper procedures. The certificated repair station must conduct adequate surveillance to ensure its QC procedures are followed.

NOTE: Contracting maintenance functions should not replace adequately staffed and trained maintenance personnel. PIs should pay careful attention to repair stations that constantly revise maintenance function lists on an emergency basis to complete work in a timely manner. PIs should verify that repair stations have the necessary trained personnel for the scope and complexity of the ratings they hold.

- **H.** Inspecting Certificated Contractor. When reviewing work that was sent to a contractor, the PI/ASI should verify the procedures in the RSM will ensure the contractor is rated for the work to be performed and the article is listed on the OpSpecs or capability list of the contracted facility. The PI/ASI should also accomplish the following:
- 1) The work should be spot-checked to ensure the contracted repair station is not providing a complete repair for a TC'd product. The contracting repair station must complete additional maintenance. Refer to § 145.217(c).
- 2) Verify that the repair station has returned all required documents with the article and has filed all complete records retained by the repair station.
- 3) Verify that the repair station included all repair records in the records sent to the end user of the article.
- **4)** Review the receiving inspection procedures to ensure that each article returning after maintenance has the required documents and receives proper inspection.
- **I. Inspecting Noncertificated Contractor.** The PI/ASI should review the RSM procedures explaining noncertificated repair facility usage. The procedures should address the contractor's QC system, which must equal the repair station's system. The PI/ASI should inspect the documents of the noncertificated contractors' quality system. The PI/ASI should:
- 1) Verify that the repair station gives the noncertificated facility procedures to properly complete the requested maintenance. These procedures could include plating procedures, blueprints, and all data necessary to do the work.

2) Verify by training records that each ASI inspecting returning articles has the training or qualifications to properly inspect an article to ensure it meets all airworthiness requirements. Verify that the noncertificated contractor completed work per instructions and data provided to the noncertificated facility.

- 3) Ensure that the repair station has a letter authorizing the FAA to inspect noncertificated facilities with which the repair station contracts. Refer to § 145.223(b) if that facility is performing work for the repair station.
- 4) Coordinate with the accountable manager to arrange an inspection if the PI/ASI needs to inspect the noncertificated facility. The onsite inspection of a noncertificated facility is not a complete base inspection of that facility. This inspection determines if that facility has the housing and facilities, tools and equipment, adequate personnel, knowledge, and appropriate technical data to complete the work for which it was contracted. The inspector should verify that the facility has a QC system in place and is following the repair station's procedures. Address all discrepancies given to the repair station for correction.
 - **J. Analyze Findings.** Follow SAS guidance for Module 5.
- **K.** Conduct Debriefing. Brief the certificate holder on the inspection results. Discuss any deficiencies and possible corrective actions. The ASI can find detailed instructions for conducting this briefing in Volume 6, Chapter 9, Section 5. Also follow SAS guidance for Module 5.
- **6-2109 TASK OUTCOMES.** Follow SAS guidance for Modules 4 and 5.
- **6-2110 FUTURE ACTIVITIES.** Follow SAS guidance.

RESERVED. Paragraphs 6-2111 through 6-2124.